

Travis Geery, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

Davenport Auto Repair and Collision
Center, LLC; Brittany Davenport,
individually; Kenneth Davenport,
individually

Defendants.

WHEREAS, the original 45-day stay was requested so that the parties could obtain documentation and information from third parties (specifically, AAA Carolinas) that they believed would facilitate resolution of this case without further Court involvement. The parties continue to believe that information from AAA Carolinas will be material, if not dispositive, to settlement.

1

WHEREAS, AAA Carolinas did not timely respond to the subpoena, at which point Plaintiff's counsel contacted the individual who accepted service. This individual referred Plaintiff's counsel to another individual at AAA Carolinas, who did not respond to Plaintiff's counsel's November 8, 2021 email regarding the status of the subpoena response (Exhibit B);

WHEREAS, on November 8, 2021, Plaintiff's counsel received correspondence from AAA's Office of General Counsel, directing Plaintiff's counsel to serve the Registered Agent (Exhibit C);

WHEREAS, on November 11, 2021, AAA's Registered Agent was served with the subpoena via process server (Exhibit D);

WHEREAS, on November 19, 2021, AAA's Legal Counsel sent correspondence indicating that it was not the correct party to respond to the subpoena and directing Plaintiff's counsel to serve The Auto Club Group, Inc., through its registered agent in Ann Arbor, Michigan (Exhibit E);

WHEREAS, on November 23, 2021, Plaintiff's counsel, transmitted the subpoena to The Auto Club Group, Inc., as directed, for service by process server. The Auto Club Group, Inc. was served on December 3, 2021 (Exhibit F). The response to the subpoena is due December 10, 2021.

WHEREAS, the Parties believe a 45-day extension will provide sufficient time to receive a response from The Auto Club Group, Inc. (and accommodate any further delays) and allow for review of the responsive documents in the context of further settlement discussions.

Dated: December 3, 2021

Respectfully submitted,

/s/ Molly R. Hamilton Cawley
Molly R. Hamilton Cawley (#11838)
Casey M. Martens (#12812)
MHC Law, LLC
460 King Street, Suite 200
Charleston, SC 29403
Tel. (843) 225-8651
Molly@mhc-lawfirm.com
Casey@mhc-lawfirm.com

ATTORNEYS FOR PLAINTIFF

/s/ William Mark White
William Mark White
Spencer and Spencer
PO Box 790
Rock Hill, SC 29731
803-327-7191
markwhite@spencerfirm.com

ATTORNEY FOR DEFENDANTS